

WORK PLAN
Globe Building Property
Brownfield Cleanup Grant (2007)

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Project Period: 2007 through 2010

1.0 INTRODUCTION

The United States Environmental Protection Agency (USEPA) has awarded a Brownfield Cleanup Grant for the former Globe Building site at Detroit, Michigan. The grant consists of \$200,000 for cleanup of hazardous substances at this site. The objective of the work is to perform remedial action in order for the site to be reused for commercial and residential development.

The Globe Building site is located at 1801-1803 Atwater Street within the city of Detroit, Michigan and is generally bounded by Atwater Street to the south, Guion Street to the north, St. Aubin Street to the east, and Orleans Street to the west. The site currently improved with an abandoned three-story industrial building approximately 80,000 square feet in size. The Globe Building was a former automotive manufacturing and foundry facility from 1884 to 1950 and a warehouse from 1950 to 1991. The building has been vacant since 1991.

The site became contaminated from historical automotive activities and railroad operations. The contamination was first revealed in February 1998 by Clayton Environmental Consultants, Inc for the previous private owner. Soil samples were detected with benzo(a)pyrene exceeding Michigan Department of Environmental Quality (MDEQ) Part 201 Generic Residential/Commercial I Cleanup Criteria.

Phase I and II environmental inquiries were conducted by Weston Solution, Inc. (Weston) for the city of Detroit in 1999. Two 20,000-gallon USTs were identified through historical records at the site. Solid waste and debris were found throughout the site. A liquid sample collected from a fill/vent pipe on the former pump island was found to contain semi-volatile organic compounds (SVOCs). No soil or groundwater sampling was conducted during Weston's Phase II Inquiry.

In 2004, MDEQ conducted a Brownfield Redevelopment Assessment (BFRA) on the property for the City of Detroit. The BFRA was conducted via a cooperative agreement with the United States Environmental Protection Agency (USEPA) and MDEQ. Seven surficial soil samples and eight soil borings, were collected from areas outside of the building. Soil samples were analyzed

to determine the levels of EPA Target Compound List (organic compounds) and Target Analyte List analysis (inorganic compounds).

Soil sampling results indicated elevated levels of organic and inorganic compound exceeding MDEQ Part 201 generic Residential Criteria. The compounds include: cis-1,2-dichloroethylbenzene, ethylbenzene, styrene, toluene, trichloroethylene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, vinyl chloride, xylenes, acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene, carbazole, dibenzo(a,h)anthracene, dibenzofuran, fluoranthene, fluorine, 2-methylnaphthalene, naphthalene, phenanthrene, pyrene, and metals (arsenic, barium, cadmium, chromium, cobalt, copper, cyanide, lead, mercury, nickel, selenium, silver, and zinc etc.). The site contamination may be a result of the historical uses as a machine shop, forge, foundry, engine works, oil house, and warehouse.

Contaminated soil was primarily found outside to the northeast and northwest of the building. The depth of contaminated material ranged from near surface to 8 feet.

2.0 RESPONSE WORK PLAN TASKS

The primary objective of the response action is to clean up the contaminated soil found on the site. The city of Detroit has identified 3 activity tasks and a developer that is currently executing a development agreement. The tasks outline assumes a cooperative agreement between the city of Detroit and the USEPA is in place by the end of September 2007.

Task 1 –Site Cleanup Planning

A response work plan will be prepared for site cleanup activities. Prior to initiating site response action activity, DEA will prepare a Request for Proposal (RFP) and conduct a Bid procurement to select a qualified environmental consultant to conduct response activity at the site. The RFP will be sent to the City's pre-qualified environmental consultant list. Procurement practices will follow USEPA guidelines as specified in the cooperative agreement between the city and federal government. The city of Detroit anticipates securing a professional services agreement with a selected environmental consultant by November 30, 2007.

The selected environmental consultant is required to prepare a response work plan to guide site remediation. The response work plan will be designed in accordance with MDEQ Part 201 Cleanup Criteria for Residential/Commercial I Land Use. The response work plan will address the soil contamination located at the site. The goal of response action is to achieve Part 201 use closure for the soil contamination at the Globe Building site for Residential and Commercial I use. The response work plan will be prepared based on the result of remedial investigation previously conducted by MDEQ and ongoing investigation activities by the developer. Proposed soil remediation involves soil excavation, removal and disposal option. No other soil remedial options will be discussed in the response work plan. The locations and extents of contaminated soil removal will be included in the response work plan. The map of soil excavation will be also provided.

The scope of work described in response work plan will be developed in cooperation with the MDEQ to assure that the cleanup will meet MDEQ's requirements for the ultimate purpose of Residential and Commercial I use of the site. DEA personnel will review, comment and approve all tasks related to the development and implementation of the response work plan. The response work plan will be submitted to EPA for review.

The Response Work Plan will also include a Health and Safety Plan (HASP) and a quality assurance project plan (QAPP).

This site has been identified as an environmentally impaired site. Site workers have potential to come into contact with environmental hazardous (such contaminated soil). Therefore, a HASP will be prepared covering work to be performed on site. The HASP will conform to all applicable Federal, State, and local safety and occupational health laws and regulations. This includes, but is not limited to, Occupational Safety and Health Administration (OSHA) standards, 29 CFR Part 1910, Section .120, "Hazardous Waste Site Operations and Emergency Response" and 29 CFR Part 1926, especially Section .65, "Hazardous Waste Site Operations and Emergency Response".

DEA will request that the selected environmental consultant provided an approved QAPP. The purpose of the QAPP is to provide project standards, establish project goals and to describe quality assurance/quality control (QA/QC) activities that will be implemented. This QAPP will apply to all activities conducted under the grant. The QAPP will be developed in accordance with the Quality Assurance Guidance for Conducting Brownfield Site Assessments (EPA 540-R098-038), EPA Guidance For Quality Assurance Project Plans (EPA QA/G-5), and with assistance from various USEPA, MDEQ, and DEA officials.

Task 2a – Site Cleanup Action

Soil remediation will be conducted in accordance with a self-implemented response work plan. The locations and extents of soil excavation will be determined based on the result of previous and ongoing remedial investigations. Based on the current investigation results, contaminated soil is considered as non-hazardous material. Contaminated soil will be excavated and removed to a Type II landfill for disposal. It is estimated that approximately 4,500 cubic yards of contaminated soil would be excavated and removed. After the contaminated soil is removed, clean granular material will be used to backfill the excavations.

Soil verification sampling will be performed after the excavation and removal of the contaminated soil to verify that the soil response activity has met MDEQ Part 201 Residential/Commercial I Cleanup Criteria. Verification sampling plan will be developed based on the requirements of MDEQ "Guidance Document for Verification of Soil Remediation". The analytical results of soil verification samples will be compared to applicable MDEQ Part 201 Residential/Commercial I Cleanup Criteria to determine whether soil remediation effort has been met.

Following the completion of cleanup activities, the selected environmental consultant will be required to develop a cleanup summary report that will provide a narrative on all task oriented objectives. This will list the findings (i.e., data), cleanup methodology, verification, etc., as well as the status of the site. The cleanup summary report developed by the selected environmental consultant will be provided to U.S. EPA. It is intended that this cleanup summary report will be provided to subsequent property owner, as well as MDEQ for site cleanup approval.

During the cleanup field activity, the selected environmental contractor will be required to prepare field notes, findings, photos, field progress meeting minutes, and other submittals.

Task 2b: Cleanup Oversight

As part of the soil cleanup activities, DEA will assure that the selected environmental consultant adhere to the project standards and established goals, as set forth within the QAPP and DEA approved remediation work plan. This task includes attending project meeting, site/field visits, and review/approval of all task related documents.

Task 3: Community Outreach

Community outreach tasks will be conducted in order to educate the residents within the community of all ongoing grant activities. Community outreach tasks may include fact sheets and brochures pertaining to project activities, contact information and literature. This task will consist of a series of community meetings, printing material distribution, and the posting of signs to alert the community of the site cleanup activities ongoing in the community.

The specific plan for communicating the project's progress with the affected community will be through regularly scheduled progress meetings with the project's consultant, developer, and DEA project manager. The local Neighborhood City Hall, Citizen District Councils (CDCs), and Community Environmental Team (CET) will be notified in advance of the time and location of the progress meetings. DEA intends to work with community group in an effort to share information and exchange ideas regarding the progress of the cleanup. DEA will also require meeting minutes at each and every progress meeting. The progress meeting minutes will be provided to the local community group. DEA staff will seek to involve other outside non-profits agencies. By doing so, DEA can ensure that a greater coverage of public notification was sought, whereby attempting to achieve a larger citizen participation. Feedback from the community will be accepted and reviewed for content and recommendations that will assist in meeting the project's overall objective.

3.0 PROJECT MANAGEMENT, SCHEDULE & BUDGET

Mr. Raymond Scott, Manager II of the Department of Environmental Affairs will serve as the Project Director. Mr. Min Yang, Environmental Specialist II will serve as the Globe Building site project manager. Min Yang will be responsible for the oversight of the contract service performed by the selected environmental consultant, Quarterly reports, invoice approval, etc.

throughout the life of the project. Mrs. Willa J. Williams, the General Manager of Department of Environmental Affairs will serve as Payee (the individual responsible to accept payments).

Directions/communications from the USEPA Project Manager to DEA will be directed through Mr. Min Yang. He will also act as liaison with the Detroit Economic Development Corporation (DEGC), property developers, and other stakeholders.

The project implementation of this cleanup grant will be the responsibility of the DEA Project Manager. DEA will submit progress reports on the work being done on a quarterly basis quarterly progress to EPA within 30 days of the end of each quarter (i.e. March 31, June 30, September 30, and December 31, etc.) during the project period. At the conclusion of the project, DEA will submit a Final Project Report summarizing the work performed and the “lessons learned” from the project as well as a final Financial Status Reports (FSR), which are due within 90 days after the expiration of the grant budget and project periods.

The anticipated schedule for the proposed work is provided Table 1:

Table 1. Activity Milestone/Timeline

Activities	Deliverables	Date
Grant Project Preparation	Project Work Plan	July 30, 2007
Develop Request for Proposal (RFP) Bid Package,	RFP	September 30, 2007
Receive and review RFP Bids, Environmental Contract Negotiation	Identification and selection of Environmental Contractor; Contract Agreement Document executed between the City and the selected environmental contractor	November 30, 2007
Review environmental data, development scope of cleanup work, response activity preparation, and site plan, etc.	Draft Response Work Plan, QAPP and HASP	February 29, 2008
Response Work Plan, QAPP and HASP Review and Approval.	Final Response Work Plan, QAPP and HASP	April 30, 2008
Soil cleanup action	Environmental activity logs and contractor submittals (to be include in Quarterly Progress Reports)	Quarterly, ongoing during cleanup activity
Soil cleanup sample analysis, sample data review, cleanup summary report preparation, etc.	Draft Cleanup Summary Report	October 31, 2008
Cleanup summary Report Review and Approval	Final Cleanup Summary Report	December 31, 2008
Grant Project Closure	Final Project Report and Final Financial Status Report.	March 30, 2009
Project Progress Monitoring	Quarterly Progress Reports	Quarterly, ongoing until project completion

Budget for the completion of the tasks identified in the Work Plan are provided in Table 2.

Table 2. Project Budget

Project Tasks	Site Cleanup Planning (Task 1)	Cleanup Activities (Task 2a and 2b)	Community Outreach (Task 3)	
Budget Categories (Programmatic costs only)				Total
Personnel				
Fringe Benefits				
Travel	2,000			2,000
Equipment				
Supplies			\$1,000	\$1,000
Contractual	\$20,000	\$210,000		\$230,000
Other: Advertising and Public Notification			\$1,000	\$1,000
Total	\$22,000	\$210,000	\$2,000	\$234,000

4.0 CONCLUSION

The city of Detroit, through its Department of Environmental Affairs, is pleased to present this Work Plan for the U.S. Environmental Protection Agency Brownfields Cleanup Grant. The USEPA's cleanup grant will be used to clean up the soil contamination, thereby creating a clean site for residential/commercial redevelopment. The proposed remediation includes excavation, removal, and disposal of contaminated soil, and post verification sampling prior to backfilling. DEA is grateful for EPA's assistance in cleaning up the Globe Building site and welcomes this partnership, as the development of this project area will create another success story to display within Region 5.